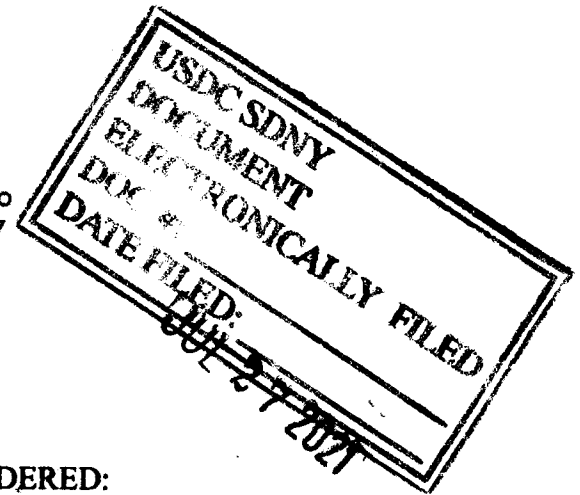


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July 26, 2021

Via ECF & Email

The Honorable George B. Daniels
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: 08/02/2021

Re: United States v. Goodman, Robert Baley, et al.
S4 20 cr 57 (GBD)

Dear Judge Daniels:

Accordingly, to the current schedule, all defense pretrial motions are to be filed on or before August 2, 2012. I respectfully request an extension of 45 days in which to file pretrial motions on behalf of Mr. Baley. Discovery is voluminous and is still being produced, particularly as to Mr. Baley. The outstanding discovery- which production is anticipated within the next week or so- is relevant to pretrial motions. The requested additional time to file pretrial motions will allow me time to review the additional discovery with Mr. Baley and to explore the possible disposition of the case short of trial.

The Government consents to this request and has agreed to the following motion schedule.

Mr. Baley pretrial motion to be filed on or before September 16, 2021;

The Government's Response is to be filed on or before October 28, 2021;

Mr. Baley shall file his Reply on or before November 11, 2021.

Respectfully submitted,

/s/

Donna R. Newman

Cc: Counsel of Record via ECF

AUSA Michael Longyear & AUSA Peter Davis & AUSA Jacob Warren via email